

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

JULIO ADRIAN SANCHEZ (01)

No. 4:24-MJ-211

CRIMINAL COMPLAINT

U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH

MAR 20 2024

CLERK, U.S. DISTRICT COURT

Deputy

I, the undersigned complainant, being duly sworn state the following is true and correct to the best of my knowledge and belief:

Alleged Offense:

On or about March 15, 2024, in the Northern District of Texas, defendant **Julio Adrian Sanchez**, an alien, was found in the United States having previously been deported and removed from the United States on or about April 21, 2016, and he had not received the consent of the Attorney General of the United States or the Secretary of the Department of Homeland Security, to reapply for admission to the United States, in violation of 8 U.S.C. § 1326(a) and (b)(1).

Probable Cause:

I, Miguel R. Miranda, Jr., being duly sworn, depose and swear the following information is true and correct to the best of my ability. I am a Deportation/Task Force Officer (DO/TFO) with the Department of Homeland Security, Immigration and Customs Enforcement (ICE) Homeland Security Investigations (HSI), currently assigned to the HSI Dallas Gangs & Violent Crimes – Dallas Task Force, with 7 years' experience, duly appointed according to law and acting as such.

1. This affidavit is made in support of a criminal complaint against Defendant **Julio Adrian Sanchez (Sanchez)**. The affiant has probable cause to believe that **Sanchez** is a previously deported alien, who unlawfully returned to the United States in violation of 8 U.S.C.

§ 1326(a) and (b)(1). **Sanchez** is an alien previously encountered by the DHS and/or legacy INS. DHS therefore maintains an "Alien File" or "A-file" for **Sanchez** that contains government records and documentary evidence related to his citizenship, nationality, alienage, immigration history, and any immigration applications submitted by him or on his behalf.

2. The statements in this affidavit are based on my personal knowledge and experience, investigation of the facts, review of documents contained in the A-file assigned to the defendant, information contained in DHS and law enforcement electronic databases, and information provided to me by witnesses or other law enforcement officers. Because this affidavit is being submitted for the limited purpose of establishing probable cause for a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth those facts that I believe are necessary to establish probable cause of a violation of a federal criminal offense, specifically, 8 U.S.C. § 1326 (a) and (b)(1), Illegal Reentry After Deportation.

3. **Sanchez** is a citizen and national of Mexico, born in Coahuila, Mexico. **Sanchez** is not a citizen or national of the United States and does not have legal immigration status in the United States.

4. On or about June 14, 2006, **Sanchez** was admitted to the United States at Dallas, Texas as a legal permanent resident.

5. On or about July 7, 2008, **Sanchez** was convicted in the 396th Judicial District Court at Tarrant County, Texas for the offense of felony possession of a controlled substance of four (4) grams or more, but less than 200 grams, to wit: Cocaine.

6. On or about November 21, 2010, **Sanchez** was encountered by ICE officials at or near Dallas, Texas, following an arrest by the Fort Worth Police Department for the offense of fail to identify.

7. On or about February 24, 2011, **Sanchez** was ordered removed from the United States to Mexico by an immigration judge in Dallas, Texas.

8. On or about March 2, 2011, **Sanchez** was removed from the United States to Mexico through Del Rio, Texas.

9. On or about March 14, 2016, **Sanchez** was encountered by ICE officials at or near Brandon, Mississippi, following an arrest by the Pearl Police Department for the offense of possession of marijuana in a vehicle and no driver license.

10. On or about March 14, 2016, **Sanchez** was issued and served a notice of intent/decision to reinstate prior order of removal by immigration agents in Pearl, Mississippi.

11. On or about April 21, 2016, **Sanchez** was removed from the United States to Mexico through Hidalgo, Texas.

12. On or about March 15, 2024, **Sanchez** came to the attention of ICE Agents in Dallas, Texas, following an active investigation by the Alcohol, Tobacco, and Firearms (ATF) special agents in Lubbock, Texas. During the investigation, ICE Agents were conducting surveillance on social media and observed **Sanchez**, the user of the facebook account “**Julio Sanchez**” post pictures and videos of himself with what appears to be a white SUV. ICE Agents discovered the white SUV in the greater Fort Worth area, believed to be linked to **Sanchez**.

13. On or about March 15, 2024, ICE Agents located a white SUV at a residential home located on Northwest 27th St. in Fort Worth, Texas. ICE Agents observed **Sanchez** exit and enter the home on multiple occasions.

14. ICE Agents were able to positively identify **Sanchez** based on the social media photos and previous jail booking photographs associated with his prior immigration encounters.

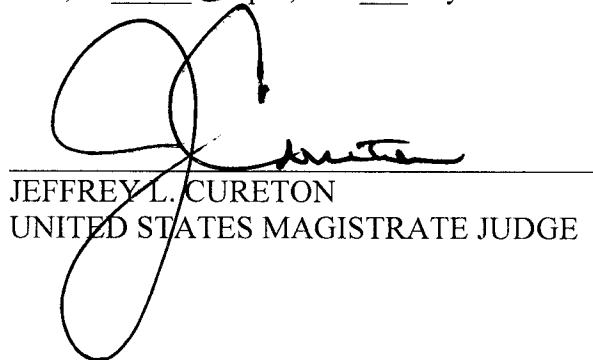
15. A review of automated immigration systems did not indicate that **Sanchez** ever applied for or received permission from the United States Attorney General or the Secretary of the Department of the Homeland Security to reenter the United States at any time after being removed from the United States. Moreover, there is no indication that **Sanchez** applied for or received a visa or permit or was paroled to enter the United States lawfully after his last removal from the United States.

Based upon the above facts and circumstances, there is probable cause to believe that **Julio Adrian Sanchez**, an alien illegally and unlawfully present in the United States, did knowingly and unlawfully reenter into the United States after a prior removal, in violation of 8 U.S.C. § 1326(a) and (b)(1).



MIGUEL MIRANDA
Deportation/Task Force Officer
Homeland Security Investigations

SWORN AND SUBSCRIBED before me, at 10:21 am/pm, this 20th day of March 2024, in Fort Worth, Texas.



JEFFREY L. CURETON
UNITED STATES MAGISTRATE JUDGE